

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	
)	Case No. 1:23-mj-210
DANIELLE C. BERRY,)	
)	
)	
Defendant.)	

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Officer Jose Palacios, being duly sworn, state the following:

1. I entered on duty with the Security Protective Service (“SPS”) of the Central Intelligence Agency (“CIA”) in October 2016. Upon joining SPS, I completed Uniformed Police Training Program at the Federal Law Enforcement Training Center, graduating in April 2017. I am a federal law enforcement officer as provided in 50 U.S.C. § 3515(a)(1).

2. This affidavit is submitted in support of a criminal complaint charging DANIELLE C. BERRY with criminal trespass at the George Bush Center for Intelligence in McLean, Virginia (“CIA Headquarters”), in violation of 32 C.F.R. § 1903.7(a), which prohibits entering or remaining on an Agency installation without proper authorization, as well as reentering or attempting to reenter a CIA installation after being instructed not to do so by an authorized person.

3. The facts and information contained in this affidavit are based upon my personal knowledge and observations during the course of this investigation, information conveyed to me by other individuals, including law enforcement officers, and my review of records, documents, and other physical evidence obtained during the investigation. This affidavit contains information

necessary to support probable cause, and it is not intended to include each and every fact and matter observed by me or known to the government.

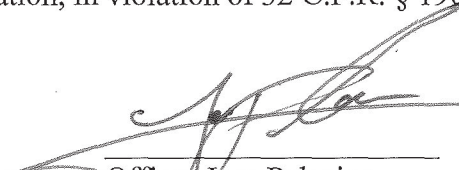
4. On October 19, 2023, at approximately 8:45 a.m., an individual in a grey Lexus sedan approached CIA Headquarters via the inbound lane of the entrance connecting to Route 123. This facility is in McLean, Virginia, within the Eastern District of Virginia. The individual was later identified by her Virginia driver's license as the Defendant, DANIELLE C. BERRY. Upon approach to the main entrance of CIA Headquarters, the Defendant passed two warning signs which read in pertinent part:

“WARNING
RESTRICTED
U.S. GOVERNMENT
INSTALLATION
EMPLOYEES AND OFFICIAL VISITORS ONLY
IT IS UNLAWFUL TO ENTER
OR ATTEMPT TO ENTER
THIS INSTALLATION WITHOUT
PROPER AUTHORIZATION.
32 C.F.R. 1903”

5. The Defendant approached and made contact with officers, seeking entrance to CIA Headquarters. When asked what her business at CIA Headquarters was, she stated that she was seeking custody of her child, had “national security” reasons, and was a whistleblower. After officers declined to admit her to the facility, the Defendant became increasingly agitated, refused to respond to questions, and expressed hostility towards the federal government in general. A

review of records indicated that the Defendant was denied entrance on multiple prior occasions, and that on October 10, 2023 was issued a citation for trespassing at CIA Headquarters and ordered not to return. Officers confirmed through CIA databases that the Defendant did not have authorization to enter an Agency installation, and then placed the Defendant under arrest.

6. Based on the foregoing, I submit there is probable cause to believe that on October 19, 2023, within the Eastern District of Virginia, DANIELLE C. BERRY did attempt to reenter an Agency installation without proper authorization, in violation of 32 C.F.R. § 1903.7(a).



Officer Jose Palacios
Security Protective Service
Central Intelligence Agency

Subscribed and sworn to before me
this 19th day of October 2023.

John F.
Anderson

Digitally signed by John F.
Anderson
Date: 2023.10.19 12:55:29
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Honorable John F. Anderson
United States Magistrate Judge
Alexandria, Virginia